

Tokio Marine Holdings, Inc.

United Nations Global Compact Communication on Progress



This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact**.

We welcome feedback on its contents.

[Statement of Support for United Nations Global Compact]

In its CSR initiatives, the Tokio Marine Group seeks to collaborate with all of its stakeholders, including members of the corporate, government and civic communities, in the solution of social issues, thereby contributing to the sustainable development of society.

The concepts behind and details of the 10 principles for behavior in connection with human rights, labor practices, environment, and anti-corruption advocated in the United Nations Global Compact coincide with the Tokio Marine Group's approach to CSR initiatives and its CSR Charter.

In April 2005, Tokio Marine Holdings (the group's holding company) announced its support for the United Nations Global Compact (hereinafter "UNGC") and became a formal participant. This decision was based upon a desire to enhance the CSR activities of the Tokio Marine Group from global perspectives and better contribute to the sustainable development of society.

Since 2007, we have served as a steering committee / secretariat member of the UN Global Compact Japan Network (hereinafter "UNGC-JN"), a network of UNGC members in Japan, and provided support for its operations. In 2009, we led a subcommittee within UNGC-JN to investigate global warming issues. We continue to work in concert with other members to share information on global warming and conduct studies of the issues.

The company supports the principles and actions of the GC and looks forward to maintaining its membership and participation in the future.

January 2010
Shuzo Sumi, President
Tokio Marine Holdings, Inc.

Reference

Message from the President: http://www.tokiomarinehd.com/en/social_respon/csr_message.html

The Global Compact and the Tokio Marine Group: http://www.tokiomarinehd.com/en/social_respon/group_csr/gcompact.html

Corporate Philosophy and CSR Charter: http://www.tokiomarinehd.com/en/social_respon/group_csr/approach.html

General CSR information

CSR Report: http://www.tokiomarinehd.com/en/social_respon/report/index.html

Comparative Table on GRI Guidelines: http://www.tokiomarinehd.com/en/social_respon/report/guide.html

[Human Rights]

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Businesses should make sure that they are not complicit in human rights abuses

[Labor]

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labor;

Principle 5: The effective abolition of child labor; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

[Human Rights] [Labor] Policy / Strategy

Principles 1-6

The Tokio Marine Group is committed to fulfilling its corporate social responsibilities (CSR) by implementing its management philosophy to achieve sustainable growth together with the development of society

Tokio Marine Holdings has formulated a "Tokio Marine Group CSR Charter" to serve as behavioral guidelines in the implementation of disciplined CSR management by all group companies.

To ensure appropriate business operations the Group adheres to fundamental policies (compliance, information security, human resources and others) as set out in the "Tokio Marine Group CSR Charter," the "Basic Policies for Internal Controls" and the Group's core management principles.

"Tokio Marine Group CSR Charter"

The Tokio Marine Group has articulated the following principles of conduct to be adhered to by all directors, officers and employees (including temporary staff) in the practice of CSR.

(Part extract from Tokio Marine Group CSR Charter)

"Respect for Human Rights and Dignity"

- We respect and actively promote the recognition of human rights for all people.
- We strive to ensure an energetic working environment that is both safe and healthy and to promote training and education of our employees.
- We respect the right to privacy and strive to enforce thorough control of personal information.

"Tokio Marine Group Code of Conduct"

(Part extract from Tokio Marine Group Code of Conduct)

We, the directors, officers and employees of the Tokio Marine Group companies, shall obey applicable laws, rules and regulations and internal rules and conduct fair and equitable business activities within social norms. In order to conduct our business in a fair manner, we shall strive to understand the applicable rules and fully comply with them.

1: "Compliance" (compliance with laws, ordinances and social norms, etc.)

#1-2 International Rules and Local Laws — The rules which we must obey are not restricted to those applicable in Japan. We shall obey international rules and local laws, rules and regulations in the countries where Tokio Marine Group companies operate. We shall also respect the traditions and cultures in such countries.

#1-4 Working Environment — We shall comply with labor-related laws, rules and regulations and maintain a safe and proper working environment.

4: "Respect for Human Rights and the Environment" (respect for the basic human rights of all human beings)

#4-1 Anti-discrimination — Human rights are values widely recognized around the world, and any discrimination on grounds of sex, age, profession,

nationality, race, thought, creed, religion, social status or birth as well as any act constituting an infringement of human rights should never be tolerated.

#4-2 Anti-harassment — Sexual or any other kind of harassment or intimidation should never be tolerated.

#4-3 Private Information — In compliance with applicable laws, rules and regulations as well as the Tokio Marine Group Privacy Policy, we shall safeguard private information, including customers' information, and we shall not use such information except on a need basis to carry out our business operations, in order to avoid any breach of privacy.

"Tokio Marine Group Basic Human Resources Policy" (domestic)

(Part extract from Tokio Marine Group Basic Human Resources Policy)

Article 6: "Human rights promotion"

Domestic group companies are required to take the following measures in recognition of the importance of human rights promotion.

- Formulate and rigorously apply policies and guidelines for human rights promotion
- Create an organization for human rights promotion overseen directly by the president
- Conduct at least one training session per year on human rights promotion for all directors, officers and employees
- Formulate and rigorously implement guidelines concerning non-discriminatory hiring practices and establish a "Committee on Non-Discriminatory Hiring Practices and Human Rights Promotion"
- Promote normalization (achieve statutory disabled hiring rates and create working environments that are suitable to disabled employees on both the software and hardware sides)
- Formulate rules to prevent sexual harassment and establish internal consultation services

"Tokio Marine Group Company Compliance and Risk Management Guidelines" (international)

- Formulate policies and guidelines for non-discriminatory hiring practices.
- Establish internal and external consultation services to prevent sexual harassment and other forms of discrimination.
- * We have enhanced management systems by formulating individual guidelines and rules in light of the circumstances at national and regional locations.

System / Action	Outcome / Evaluation
<p>Principles 1-6</p> <p>In the case of non-compliance (including doubtful cases) with this Code of Conduct, applicable laws, rules and regulations or internal rules, we, the directors, officers and employees of the Tokio Marine Group companies, shall make a prompt report or consultation in accordance with the applicable internal rules. If, for any reason, it is not appropriate to make use of the regular reporting system, one of the hotlines, including the external hotline (assigned law firm) may be used.</p> <p>The reporter will not be treated disadvantageously because of his or her report. Furthermore, private information of the reporter shall be handled responsibly.</p> <p>Based on the mechanisms described above, Group companies shall create compliance manuals and shall formulate and implement annual CSR and human rights plans.</p>	<p>Principles 1-6</p> <p>Tokio Marine & Nichido quantitatively evaluates the results of activities each year based on KPIs.</p> <p>KPIs include criteria such as employee satisfaction with corporate ethics and respect for human rights, disabled employment rates and numbers of female employees in positions of responsibility. They are used in plan-do-check-act (PDCA) monitoring and in the formulation of new strategies. KPIs are incorporated into the evaluation criteria used to determine executive compensation at Tokio Marine Holdings and Tokio Marine & Nichido.</p> <p>* Some KPIs are disclosed as Tokio Marine & Nichido's CSR indicators.</p> <p>http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html</p> <p>http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion02.html</p>

<p>Principles 1 and 2</p> <p>Group companies conduct training sessions for all directors, officers and employees each year in order to deepen their respect for human rights and prevent all forms of discrimination and harassment.</p> <p>Group companies also hold seminars featuring outside lecturers. Group companies also provide training tools on human rights issues to agents, which constitute an important business partner.</p>	<p>Principles 1 and 2</p> <p>Group companies conduct human rights promotion training (e-learning, lectures) for all directors, officers and employees. Tokio Marine Holdings and Tokio Marine & Nichido hold seminars on CSR and human rights featuring outside lecturers for their executive-level employees. Tokio Marine & Nichido also provides training tools (e-learning, handbooks, and videos) on human rights issues to employees and agencies once per year to assist in their human resources development.</p> <p>In March 2009, Tokio Marine & Nichido formulated a "Code of Conduct in Business Transactions" for its business partners, requiring them to adhere to national laws and ordinances and social norms, etc.</p>
<p>Principles 3-6</p> <p>Group companies adhere to labor-related laws and ordinances in accordance with national laws, ordinances and rules, endeavor to build sound labor-management relations, maintain safe and healthy working environments, rigorously manage working hours and promote appropriate and fair hiring.</p>	<p>Principles 3-6</p> <p>Tokio Marine & Nichido holds approximately 50 meetings each year with the Tokio Marine & Nichido Labor Union to discuss wages, human resources systems, labor safety and sanitation, management programs and policies, and a wide range of other issues. The company also engages in negotiations and consultations with a number of other labor unions, working in a sincere and forthright manner towards the resolution of management issues.</p> <p>Like Tokio Marine & Nichido, other group companies enjoy sincere and forthright relationships with their labor unions and employee representatives, negotiating and consulting with them towards the resolution of management issues.</p> <p>Group companies emphasize work/life balance and rigorously manage the working hours of their employees (including temporary staff). Each year, the company conducts health checkups and counseling for all employees as part of its efforts to provide thoroughgoing physical and mental health management.</p> <p>Major group companies have employee checkup rates of virtually 100%. (FY2008)</p>
<p>Principle 6</p> <p>The Tokio Marine Group believes it essential that motivated and capable employees who possess diverse senses of value should display their capabilities to the full, regardless of gender, age, nationality or other attributes, to improve the quality of the products and services that it provides to customers worldwide.</p> <p>We promote diversity within the group as a whole by encouraging the hiring of the disabled, providing opportunities for female employees, and creating workplaces that are conducive to the employment of knowledgeable, experienced senior employees.</p>	<p>Principle 6</p> <p>The Tokio Marine Group's domestic member companies have been making efforts to develop a working environment where employees with disabilities can work comfortably and demonstrate their abilities to the utmost extent through such means as individual counseling and improvements in the infrastructure appropriate for their specific needs. Currently, the Group's companies in Japan employ 509 individuals with disabilities. The percentage of employees with disabilities stood at 1.89% as of March 31, 2009.</p> <p>Females account for approximately half of the Tokio Marine Group workforce. The company has expanded the range of fields open to them and encourages them to be active in these fields as a means of meeting the diverse expectations of our customers and appropriately responding to their needs.</p> <p>Domestic Group companies hold a regular, annual "Women's Forum." In FY2008, a total of 220 female employees from domestic group companies participated in the</p>

"Women's Forum."

Tokio Marine & Nichido also holds regular meetings for direct communications between executives and female managers. These meetings provide an opportunity to listen to the opinions of female employees, use them to make improvements in company policies and programs and improve workplaces so as to facilitate the activities of female employees throughout the company.

The numbers of female managers are steadily increasing at domestic group companies; there are currently 186 females in management positions as of July 31, 2009.

[Human Rights] [Labor] Reference

Corporate Philosophy and CSR Charter: http://www.tokiomarinehd.com/en/social_respon/group_csr/approach.html

Tokio Marine Group Code of Conduct: <http://www.tokiomarinehd.com/en/conduct/index.html>

Relations with employees: http://www.tokiomarinehd.com/en/social_respon/stakeholder/employee.html

Tokio Marine & Nichido Corporate Value Index: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html

Tokio Marine & Nichido's CSR Indicators: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion02.html

[Environment]

Principle 7: Business should support a precautionary approach to environmental challenges;
Principle 8: Undertake initiatives to promote greater environmental responsibility, and;
Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Policy / Strategy

Principles 7-9

The Tokio Marine Group endeavors to protect the global environment in all aspects of its business activities.

"Tokio Marine Group CSR Charter"

(Part extract from Tokio Marine Group CSR Charter)

"Protection of the Global Environment"

- Acknowledging that the protection of the global environment is an important responsibility for all corporate entities, we respect harmony with and improving the global environment in all of our activities.

"Tokio Marine Group Code of Conduct"

(Part extract from Tokio Marine Group Code of Conduct)

4 : "Respect for Human Rights and the Environment" (environment-friendly action)

- #4-4 Protection of the global environment — Acknowledging that the protection of the global environment is an important responsibility, we shall comply with applicable laws, rules and regulations, and respect the harmonization with and the improvement of the global environment in all of our activities.

"Environmental Philosophy/Environmental Policy of Tokio Marine & Nichido"

"Environmental Philosophy"

Adopting the conservation of the global environment as one of its key management policies, Tokio Marine & Nichido recognizes that it is an important responsibility of all humans and companies in the present world to protect the environment. Tokio Marine & Nichido commits to taking up the task of bringing about a society where sustainable development is maintained through the efforts of all employees throughout the entire range of our business activities, in order to improve and keep harmony with the environment.

"Environmental Policy"

- Preservation of the global environment through the insurance business
- Efficient use of resources and energy
- Compliance with environmental laws and regulations
- Continuous improvement of the environment and prevention of pollution
- Promotion of environmental awareness-raising and philanthropic activities

System / Action

Principles 7-9

In light of the highly public nature of the insurance business, insurance companies must provide products and services to their customers that are stable and viable over the long term.

In FY2006, the Tokio Marine Group launched a "Global Warming Research Project Team," with Tokio Marine & Nichido and Tokio Marine Research Institute serving as the leading members. The team is tasked with studying and researching risk management and product development responding to climate change.

Tokio Millennium Re (Bermuda) holds a regular "Summit on

Outcome / Evaluation

Principles 7-9

The Tokio Marine Group collaborates with outside academic institutions (University of Tokyo and Nagoya University) to study the impact of climate change on typhoons and other natural disasters. We aim to use the findings from this research to improve the accuracy of risk management, develop and market new products and services and communicate information to the general public.

In November 2007, Tokio Marine & Nichido formulated a "Comprehensive Program on Climate Change to serve as a strategy framework for climate change as well as an action plan for specific business areas. In accordance with the Comprehensive Program, the company is now working to improve the level of its activities and better contribute to the achievement of a sustainable society.

<p>Global Warming and Climate Change" to which it invites experts on climate change risk and natural disaster risk assessment from around the world to study and research climate change and global warming with a focus on hurricanes in the United States.</p>	<p>Receiving high acclaim for these comprehensive initiatives, Tokio Marine & Nichido was certified as an "Eco-First Company" in November 2008 based on the "Eco-First Program" established by the Ministry of the Environment of Japan.</p> <p>Tokio Marine & Nichido conducts quantitative evaluations of activity results each year based on KPIs. It also uses KPIs in PDCA monitoring and the formulation of new strategies.</p> <p>KPIs include CO₂ emissions and use of paper resources, and they are incorporated into the evaluation criteria used to determine executive compensation at Tokio Marine Holdings and Tokio Marine & Nichido.</p> <p>* Some KPIs are disclosed as Tokio Marine & Nichido's CSR indicators.</p> <p>http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion02.html</p>
<p>Principle 7</p> <p>Since 1999 under the concept of "insurance for the future of the Earth," , Tokio Marine & Nichido has been active in mangrove afforestation projects, primarily in Southeast Asia.</p> <p>Mangrove trees have wide-ranging effects on the Earth. They help to prevent and mitigate global warming by absorbing and storing CO₂ and preserve ecosystems and biodiversity. They can also serve as bulwarks to protect people from tsunamis and other natural disasters.</p>	<p>Principle 7</p> <p>In November 2008, Tokio Marine & Nichido declared a commitment to maintain its involvement in mangrove afforestation projects for the protection of the global environment for the next 100 years.</p> <p>Over the 10-year period from 1999 to 2008, 5,901 hectares of forests had been planted in six countries. Phase 3 of the project (from 2009 to 2013) will add India as a seventh country, and plans to reforest 2,300 hectares.</p>
<p>Principle 8</p> <p>The Tokio Marine Holdings Board of Directors and CSR Board (committee made up of the presidents of group companies) formulate an annual plan for global environmental protection that includes reductions of environmental load throughout the group. These bodies also monitor performance throughout the year.</p> <p>Group companies nominate CSR key persons to promote global environmental protection and social contribution activities. Programs are coordinated internally and among group companies.</p> <p>Since FY1999, the Head Office of Tokio Marine & Nichido has adopted an environmental management system based on the ISO14001 environmental management standard.</p> <p>Tokio Marine & Nichido (excluding the head office) and all domestic member companies of the Tokio Marine Group have introduced a unique environmental management system of their own ("Green Assist"). Steps are being taken through the</p>	<p>Principle 8</p> <p>In FY2008, the volume of CO₂ emissions produced by buildings used by domestic Group member companies totaled 68,637t-CO₂. The amount of paper used by Tokio Marine & Nichido totaled 10,065 tons, a reduction of 10.4% on the previous fiscal year.</p> <p>As a medium-term target, Tokio Marine & Nichido has established a 6% reduction in CO₂ emissions against the FY2006 level by FY2012. In FY2008, the amount of CO₂ emitted was 63,801t-CO₂,* which is an increase of 2% on FY2006 but a decrease of 2.4% on FY2007.</p> <p>* Reference: Environmental impact data http://www.tokiomarinehd.com/en/social_respon/contribute/environment02.html</p> <p>Internal and external audits based on ISO14001 have detected no major problems or violations of environmental laws, and no complaints from customers regarding the environment have been filed with the Tokio Marine Group.</p>

implementation of the plan-do-check-act (PDCA) cycle and to reduce the environmental impacts from business activities.

Tokio Marine Holdings is gradually increasing the scope of environmental impact data reporting to encompass more group companies throughout the world.

Group companies work to save energy by adjusting office air-conditioning to appropriate levels, turning off lights during lunch breaks and other down-to-earth efforts. They also work to make their operations more paperless by eliminating forms and ledgers and computerizing processes where possible, thereby reducing the amount of paper consumed.

<p>Principle 8</p> <p>The Tokio Marine Group develops and markets products that respond to climate change and biodiversity issues as part of its efforts to contribute to global environmental protection through the insurance business.</p>	<p>Principle 8</p> <p>Tokio Marine & Nichido is currently pursuing a project to encourage web-based browsing of content of clauses rather than sending paper copies to customers. (The "Green Gift" Project, initiated in 2009)</p> <p>When a customer signing a new policy elects to view it on the website, the company donate money equivalent to two mangrove seedlings to a mangrove afforestation project.</p> <p>This project is an example of how the company works in collaboration with its customers to save paper resources and reduce CO₂ emissions, thereby helping to alleviate global warming and preserve biodiversity.</p>
<p>Principle 9</p> <p>Tokio Marine & Nichido participates in domestic and international global environmental protection initiatives as one of the leading companies in Japan, and is active in the provision of information and advice.</p> <p>It also participates in the meetings of the General Insurance Association of Japan and Nippon Keidanren. At these organizations, it is involved in the formulation of recommendations concerning the reduction of industrial energy usage and in research into emissions rights trading.</p> <p>The company is a signatory to the UNEP Financial Initiative (UNEP FI) and is the only company from Asia on the Insurance Working Group (made up of around a dozen leading insurance companies from around the world).</p>	<p>Principle 9</p> <p>The Geneva Association—a nonprofit organization composed of approximately 80 executives from major insurance companies and reinsurance companies around the globe—launched the CC+I Project in FY2008 to conduct surveys and research from a wide array of perspectives into the economic and social impacts of climate change and related insurance. The Geneva Association adopted the Kyoto Statement in May 2009. The Kyoto Statement is the first declaration made by the insurance industry that summarizes the roles that the industry must take on in response to risks posed by climate change in light of the impact climate change is exerting on society.</p> <p>Tokio Marine & Nichido participated in the theme as a co-chair and was responsible for a part of the research (best practices for insurance companies regarding climate change).</p> <p>The company also cosponsored a seminar on "Role of Finance and Insurance in Response to Climate Change" with UNEP FI in November 2008 to provide a forum for communicating the latest insights and information on climate change to the public at large. As a member of the UNEP FI Insurance Working Group, the company entered into partnerships with leading academic organizations in Europe and North America to perform a global-scale study on the incorporation of environment (including climate change), society and governance ("ESG") into insurance underwriting and product development. The results of this research have been published.</p> <p>The company also participated as a launch member in the "Japan Climate Leaders' Partnership" (hereinafter "Japan-CLP"), which was established in July 2009, and proactively works to address climate change issues with the goal of achieving a low-carbon society. Japan-CLP held a symposium for government, private-sector and academic representatives in December 2009 that issued joint recommendations to the public on a sustainable low-carbon society.</p>

Reference

Corporate Philosophy and CSR Charter: http://www.tokiomarinehd.com/en/social_respon/group_csr/approach.html

Tokio Marine Group Code of Conduct: <http://www.tokiomarinehd.com/en/conduct/index.html>

Contributions to the Global Environment: http://www.tokiomarinehd.com/en/social_respon/contribute/environment.html

Tokio Marine & Nichido Corporate Value Index: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html

Tokio Marine & Nichido's CSR Indicators: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion02.html

UNEP FI Insurance Working Group: http://www.unepfi.org/work_streams/insurance/index.html

The Geneva Association: http://www.genevaassociation.org/Home/Climate_Change.aspx

Japan-CLP: <http://japan-clp.jp/en/index.html>

[Corruption]

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

Policy / Strategy

Principle 10

The Tokio Marine Group requires all directors, officers and employees to conduct business in a sincere and fair manner, adhering to all laws, ordinances and social norms, etc.

"Tokio Marine Group CSR Charter"

(Part extract from Tokio Marine Group CSR Charter)

"Compliance"

- While striving to maintain high ethical standards at all times, we will pursue strict compliance in all aspects of our business activities.

"Tokio Marine Group Code of Conduct"

(Part extract from Tokio Marine Group Code of Conduct)

All directors, officers and employees are required to adhere to domestic rules, international rules, national laws and ordinances, and to respect the customs and cultures of the countries in which the Tokio Marine Group does business. With respect to entertainment and gifts, "we shall not accept money, goods and other inappropriate or unlawful profits by taking advantage of our position. Also, we shall not accept or give any gifts or entertainment which are illegal or not considered reasonable by social standards."

1. "Compliance": Compliance with applicable laws, regulations, international rules and local laws, promotion of fair and free competition, prevention of conflicts of interest, protection of intellectual property, maintaining a safe and proper working environment, etc.

1-5. "Insider Trading": We shall not buy or sell securities of any company while in possession of material, non public information (Known as "Insider information") regarding the subject company in violation of securities related laws, rules or regulations. This rules applies not only to the securities of Tokio Marine Holdings, Inc. but also to those of other companies. Without authorization, we shall not pass inside information to any other person.

2. "Social and Political Issues": Maintaining a firm stand against all anti-social forces, prevention of money laundering, respect for laws and ordinances concerning political activities, prohibition against accepting and giving entertainment and gifts, etc.

System/Action

In the case of non-compliance (including doubtful cases) with this Code of Conduct, applicable laws, rules and regulations or internal rules, we, the directors, officers and employees of the Tokio Marine Group companies, shall make a prompt report or consultation in accordance with the applicable internal rules.

If, for any reason, it is not appropriate to make use of the regular reporting system, one of the hotlines, including the external hotline (assigned law firm) may be used.

The reporter will not be treated disadvantageously because of his or her report. Furthermore, private information of the reporter shall be handled responsibly.

Outcome/Evaluation

Tokio Marine & Nichido quantitatively evaluates the results of activities each year based on KPIs.

KPIs include criteria such as corporate ethics and compliance. They are used in PDCA monitoring and in the formulation of new strategies. Tokio Marine Holdings also incorporates KPIs into the evaluation criteria used to determine executive compensation at Tokio Marine & Nichido.

- * Some KPIs are disclosed as Tokio Marine & Nichido's CSR indicators.

http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html

http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion02.html

Based on the mechanisms described above, Tokio Marine Group companies create their own compliance manuals and formulate and implement annual plans for CSR and human rights.

The Tokio Marine Group takes initiatives based on individually-formulated compliance implementation plans. Tokio Marine Holdings and Tokio Marine & Nichido have also held compliance seminars featuring outside lecturers that are open to employees at the director and executive levels. Directors, officers and employees have been provided with compliance training as well.

Tokio Marine Holdings performs monitoring (internal audits) for all Group companies to confirm effectiveness.

Reference

Corporate Philosophy and CSR Charter: http://www.tokiomarinehd.com/en/social_respon/group_csr/approach.html

Tokio Marine Group Code of Conduct: <http://www.tokiomarinehd.com/en/conduct/index.html>

Compliance: http://www.tokiomarinehd.com/en/social_respon/management/compliance.html

Tokio Marine & Nichido Corporate Value Index: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion01.html

Tokio Marine & Nichido's CSR Indicators: http://www.tokiomarinehd.com/en/social_respon/group_csr/promotion02.html